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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, MONIQUE  
TRUJILLO, WILLIAM BYATT, JEREMY  
DAVIS, and CHRISTOPHER CASTILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**JOINT STIPULATION AND [PROPOSED]  
ORDER EXTENDING TIME FOR  
GOOGLE TO SUBMIT DECLARATION  
IN SUPPORT OF PLAINTIFFS'  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER PORTIONS OF  
PLAINTIFFS' RENEWED REQUEST TO  
DEPOSE SUNDAR PICHAI SHOULD BE  
SEALED (DKT. 634)**

The Honorable Susan van Keulen

Pursuant to Civil Local Rule 6-2 and 7-12, this joint stipulation is entered into between Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

WHEREAS, on July 21, 2022, Plaintiffs filed their Administrative Motion to Consider Whether Portions of Plaintiffs’ Renewed Request to Depose Google CEO Sundar Pichai Should Be Sealed (“Motion to Seal”) (Dkt. 634);

WHEREAS, on July 21, 2022, Google received unredacted copies of Plaintiffs’ Motion to Seal and exhibits cited in Dkt. 635;

WHEREAS, pursuant to Civil Local Rule 79-5(e), the deadline for Google, as the Designating Party to portions of Plaintiffs’ Motion to Seal (Dkt. 634), to establish that such designated material is sealable, is Thursday, July 28, 2022;

WHEREAS, Google has requested and Plaintiffs do not oppose an extension of time of 14 days to Thursday, August 11, 2022, which Google has represented will provide it with sufficient time to submit its declaration in support of its designated materials in the filings (Dkt. 634);

NOW THEREFORE, the Parties stipulate to extend the deadline by which Google shall submit a Declaration in support of Plaintiffs’ Motion to Seal (Dkt. 634), to Thursday, August 11, 2022.

DATED: July 26, 2022

QUINN EMANUEL URQUHART &  
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/s/ Andrew H. Schapiro

/s/ Mark Mao

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*Attorneys for Plaintiffs*

**ATTESTATION OF CONCURRENCE**

I am the ECF user whose ID and password are being used to file this JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR GOOGLE TO SUBMIT DECLARATION IN SUPPORT OF PLAINTIFFS' ADMINISTRATIVE MOTION TO CONSIDER WHETHER PORTIONS OF PLAINTIFFS' RENEWED REQUEST TO DEPOSE SUNDAR PICHAI SHOULD BE SEALED (DKT. 634). Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document

Dated: July 26, 2022

By /s/ Andrew H. Schapiro

Andrew H. Schapiro

*Counsel on behalf of Google*

**[PROPOSED] ORDER**

Pursuant to stipulation of the Parties, the Court hereby **ORDERS:**

The deadline for Google to submit a Declaration in support of Plaintiffs' Administrative Motion to Consider Whether Portions of Plaintiffs' Renewed Request to Depose Google CEO Sundar Pichai Should Be Sealed (Dkt. 634), shall be extended to August 11, 2022.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
HON. SUSAN VAN KEULEN  
United States Magistrate Judge